



STERLING DRUG INC.

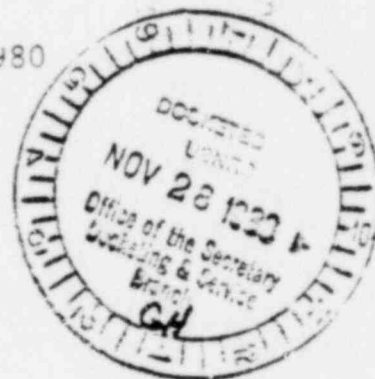
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JACKET NUMBER
PROPOSED RULE PR 20
45 FR 67018

November 21, 1980

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch



Gentlemen:

Sterling Drug Inc., whose principal place of business is located at 90 Park Avenue, New York, New York 10016 is a manufacturer of both ethical and proprietary pharmaceuticals, and is involved in pharmaceutical research activities, and as such, is an interested party in the proposed rule on the Standards for Protection Against Radiation (40 CFR Part 20) as published in the October 8, 1980 issue of the Federal Register, pages 67018 - 67020. We hereby offer the following comments in support of these proposals:

As part of our pharmaceutical research activities, we utilize liquid scintillation medium and animals. In our opinion, the disposal of the scintillation medium and animal carcasses in the amounts specified by this proposal will not adversely impact radiological health. A significant savings in the pharmaceutical industry would be realized by the use of sanitary sewerage systems.

We recommend that the proposal be finalized on an "as is" basis and that further consideration be given to liberalizing similar restrictions for other radionuclides. Accordingly, we request that the October 8, 1980 proposal be finalized.

Respectfully yours,

Anthony E. Anzalone
Anthony E. Anzalone
Corporate Director
Government Affairs

AEA/LAH/mla

Acknowledged by card... 11/29/80

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